

1 KIMBERLY MAXSON-RUSHTON  
2 Nevada Bar #005065  
3 COOPER LEVENSON APRIL  
4 NIEDELMAN & WAGENHEIM, P.A.  
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6 Las Vegas, Nevada 89101  
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9 Attorneys for Defendant  
10 LUCKY CAB COMPANY OF NEVADA,  
11 A Nevada Corporation d/b/a LUCKY TRANS

12  
13 UNITED STATES DISTRICT COURT  
14 DISTRICT OF NEVADA

15 THEODORE TRAPP, on his own behalf and  
16 on behalf of all others similarly situated,

17 Plaintiff,

18 vs.

19 BIG POPPA'S, LLC, a Nevada limited  
20 liability company d/b/a BADDA BING  
21 MEN'S CLUB; SKY TOP VENDING, INC.,  
22 a Nevada Corporation d/b/a CAN CAN  
23 ROOM; LA FUENTE, INC., a Nevada  
24 corporation d/b/a CHEETAS'S; C.P. FOOD  
25 AND BEVERAGE, INC., a Nevada  
26 corporation d/b/a CLUB PARADISE; DÉJÀ  
27 VU SHOWGIRLS OF LAS VEGAS, LLC, a  
28 Nevada limited liability company d/b/a DÉJÀ  
VU SHOWGIRLS; PALOMINO CLUB,  
INC., a Nevada corporation d/b/a PALOMINO  
CLUB; SHAC, LLC, a Nevada limited  
liability company d/b/a SAPPHIRE; K-KEL,  
INC., a Nevada corporation d/b/a  
SPEARMINT RHINO; D2801 WESTWOOD,  
INC., a Nevada corporation d/b/a  
TREASURES; LITTLE DARLINGS OF LAS  
VEGAS, LLC, a Nevada limited liability  
company d/b/a LITTLE DARLINGS; O.G.  
ELIADÉS, A.D., LLC, a Nevada limited  
liability company d/b/a OLYMPIC  
GARDENS; LAS VEGAS  
ENTERTAINMENT, a Nevada limited  
liability company d/b/a LARRY FLYNT'S  
HUSTLER CLUB; MICHAEL A. SALTMAN  
d/b/a MINXX; RICK'S LAS VEGAS; FRIAS  
MANAGEMENT, LLC, a Nevada limited  
liability company d/b/a ACE CAB  
COMPANY and A-NORTH LAS VEGAS  
CAB; WESTERN CAB COMPANY, a

CASE NO. 2:09-cv-00995

**DEMAND FOR SECURITY OF COSTS**

Date of Hearing: N/A

Time of Hearing: N/A

1 Nevada corporation d/b/a WESTERN CAB  
COMPANY and WESTERN LIMOUSINE;  
2 NEVADA CHECKER CAB  
CORPORATION, a Nevada corporation d/b/a  
3 CHECKER CAB COMPANY; NEVADA  
STAR CAB CORPORATION, a Nevada  
4 corporation d/b/a STAR CAB COMPANY;  
NEVADA YELLOW CAB CORPORATION,  
5 a Nevada corporation d/b/a YELLOW CAB  
COMPANY; LUCKY CAB COMPANY OF  
6 NEVADA, a Nevada corporation d/b/a  
LUCKY TRANS; SUN CAB, INC., a Nevada  
7 corporation d/b/a NELLIS CAB COMPANY;  
CLS NEVADA, LLC, a Nevada limited  
8 liability company d/b/a CLS  
TRANSPORTATION LAS VEGAS; ON  
9 DEMAND SEDAN SERVICES, LLC, a  
Nevada limited liability company d/b/a ODS  
10 LIMOUSINE and ODS CHAUFFEURED  
TRANSPORTATION; BLS LIMOUSINE  
11 SERVE OF LAS VEGAS; DESERT CAB,  
INC. a Nevada corporation d/b/a DESERT  
12 CAB COMPANY and ODYSSEY  
LIMOUSINE; BELL TRANS A NEVADA  
13 CORPORATION, a Nevada corporation d/b/a  
BELL TRANS; TONY CHONG, and  
14 individual; and DOE EMPLOYEES 1-1000;

15 Defendants.

16  
17 TO: THEODORE TRAPP, Plaintiff; and  
18 TO: JAY EDELSON, ESQ., RAFEY S. BALABANIAN, ESQ., and JAMES E. SMYTH,  
19 ESQ., Attorneys for Plaintiff;

20 Pursuant to NRS 18.130, LUCKY CAB COMPANY OF NEVADA, a Nevada corporation  
21 d/b/a LUCKY TRANS hereby makes demand upon Plaintiff, who resides out of State, for security in  
22 the amount of Five Hundred and No/100 Dollars (\$500.00) for costs and charges which may be  
23 awarded herein against Plaintiff. The requirements of NRS 18.130 apply to actions in the United  
24 States District Court,

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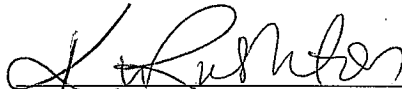
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1 District of Nevada. Truck Ins. Exchange, 683 F. Supp. 223, 227-28 (D. Nev. 1988); Hamar v.  
2 Hyatt Corp., 98 F.R.D. 305, 305-06 (D. Nev. 1983).

3  
4 Dated this 16 day of June, 2009.

5 COOPER LEVENSON APRIL  
6 NIEDELMAN & WAGENHEIM, P.A.

7  
8 By   
9 Kimberly Maxson-Rushton  
10 Nevada Bar No. 005065  
11 900 South Fourth Street  
12 Las Vegas, Nevada 89101  
13 Attorneys for Defendant  
14 LUCKY CAB COMPANY OF NEVADA, a  
15 Nevada corporation d/b/a LUCKY TRANS  
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**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5 (b), I certify that I am an employee of COOPER LEVENSON APRIL NIEDELMAN & WAGENHEIM P.A. and that on this 21<sup>st</sup> day of June, 2009, I did cause a true copy of the foregoing **DEMAND FOR SECURITY OF COSTS** to be served via CM/ECF electronic filing upon the following person(s).

**Jay Edelson**

Kamber Edelson LLC  
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By 

An Employee of  
COOPER LEVENSON APRIL  
NIEDELMAN & WAGENHEIM, P.A.